


MEMORANDUM
DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER DIVISION

SUBJECT: Guidance Memo No. 97-002
Holding Time Requirements

TO: Regional Directors

FROM: Larry G. Lawson, P.E. 

DATE: March 14, 1997

COPIES: Regional Office Permit Managers, Regional Office Water Permit Managers, Regional Compliance and Enforcement Managers, Martin Ferguson, Jack Vanderland, Amy Clarke

VPDES monitoring parameters that cannot be preserved due to physical or chemical characteristics must be "analyzed immediately" according to federal testing regulations. Immediately is a nebulous term and is open to interpretation. To clarify this point footnote 4 from Table II Required Containers, Preservation Techniques, and Holding Times, 40 CFR 136.3 defines analyze immediately as "within 15 minutes or less of sample collection." The water inspection staff has observed this requirement for all parameters with the analyze immediately requirement with the exception of pH. Until now the laboratory inspection program has held permittees to a pH holding time of 30 minutes. In an effort to consistently interpret the NPDES testing regulations the holding time for pH should be reduced to 15 minutes or less.

This change in the way we interpret the testing regulations should not create difficulties for most permittees. However, should a permittee wish to have an extended holding time, provisions in 40 CFR 136.4 allow permittees to apply for an alternate test procedure variance. Verification of this new holding time should be documented during a laboratory inspection, by use of the attached Sample Analysis Holding Time/Container/Preservation Checksheet. The checksheet has been revised to reflect the new holding time requirement. Copies can be down loaded from K:\agency\labshts.

Permittees and contract laboratories not meeting this preservation requirement at the time of their next inspection should be rated as satisfactory with qualifications, provided the holding time is not greater than the current requirement of 30 minutes. Facilities unable to immediately change preservation procedures should be given sufficient time to do so or apply for a variance. Failure to meet this holding time requirement during subsequent inspections should result in an unsatisfactory rating until corrective action is taken.

Questions or comments regarding pH holding time should be directed to Bill Purcell at (804) 698-4048.

DISCLAIMER

This document provides technical and procedural guidance to the inspection staff to evaluate laboratories producing data related to permit compliance. This document is guidance only. It does not establish a binding norm and is not finally determinative of the issues addressed. Agency decision in any particular case will be made by applying the State Water Control Law and the implementation regulations on the basis of site specific facts.

FACILITY NAME:	FACILITY NO:	DATE:
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PARAMETER	HOLDING TIMES					SAMPLE CONTAINER				PRESERVATION			
	APPROVED	MET? (U)		LOGGED? (Q)		ADEQ. VOLUME (Q)		APPROP. TYPE (Q)		APPROVED	MET? (U)		CHECKED? (Q)
		Y	N	Y	N	Y	N	Y	N		Y	N	
BOD5 & CBOD5	48 HOURS									ANALYZE 2 HRS or 4° C			
TSS	7 DAYS									4° C			
FECAL COLIFORM	6 HRS & 2 HRS TO PROCESS									4° C (1 HOUR) + .008% Na ₂ S ₂ O ₃			
pH	15 MIN.									N/A			
CHLORINE	15 MIN.									N/A			
DISSOLVED O ₂	15 MIN./IN SITU									N/A			
TEMPERATURE	IMMERSION STAB.									N/A			
OIL & GREASE	28 DAYS									4° C + H ₂ SO ₄ /HCL pH < 2			
AMMONIA	28 DAYS									4° C + H ₂ SO ₄ pH < 2			
TKN	28 DAYS									4° C + H ₂ SO ₄ pH < 2			
NITRATE	48 HOURS									4° C			
NITRATE + NITRITE	28 DAYS									4° C + H ₂ SO ₄ pH < 2			
NITRITE	48 HOURS									4° C			
PHOSPHATE, ORTHO	48 HOURS									FILTER, 4° C			
PHOSPHORUS, TOTAL	28 DAYS									4° C + H ₂ SO ₄ pH < 2			
RATING:										RATING:			